

From: [Coltrain, Katrina](#)
To: [Jeff Pearl](#); [Todd Downham \(todd.downham@deq.ok.gov\)](#)
Cc: [Dawn Sullivan](#); [Shannon Sheffert](#); [Mark Zishka](#); [Mark Scott](#); [James Pruett](#); [Amy.Brittain@deq.ok.gov](#)
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow
Date: Friday, October 23, 2015 3:52:00 PM

Jeff, thank you for the update and summary of actions that are planned to take place during the ongoing bridge construction at 8th Street, over Sand Creek, in Bristow, OK. As you mention below, our primary concern is related to the potential for erosion of oil material that may be present. Based on your summary, we understand that the principal action is to complete work by coving the oil material with fill followed by a filter blanket that will then be topped with rip rap. We understand that this action is designed to stabilize the bank while mitigating the potential for erosion. The investigation activities that will be conducted as part of the Wilcox Oil company Superfund Site will include an investigation of the stream including the area around the bridge. Once we have a better understanding of the location and extent of oil material, we will be able to assess and discuss any future actions.

Katrina Higgins-Coltrain
Remedial Project Manager
US EPA Region 6
LA/OK/NM Section (6SF-RL)
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From: Jeff Pearl [mailto:JPEARL@ODOT.ORG]
Sent: Friday, October 23, 2015 3:06 PM
To: Coltrain, Katrina; Todd Downham (todd.downham@deq.ok.gov)
Cc: Dawn Sullivan; Shannon Sheffert; Mark Zishka; Mark Scott; James Pruett; Amy.Brittain@deq.ok.gov
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow
Importance: High

Katrina and Todd –

As discussed on-site yesterday, a relatively small amount of suspected oil material was encountered during removal of the work road. A very slight sheen was mitigated by the oil absorbent booms and pads that has already been deployed by the environmental contractor, as per the approach described below. The location and elevation of the material is generally as expected, near the toe of each slope to the creek bed. On the west side, a very small patch (app. 12" diameter) was revealed when a large stone was removed from the toe of the slope. The slope was not pulled back any further at that point, and the condition left for further observation. On the east side, the material was exposed when the teeth of the trackhoe bucket inadvertently penetrated the toe of the slope. In this area, since the material was in close proximity to creek water, the material was cast upslope

several feet and later collected and placed into a 55-gallon drum. Both areas were left exposed, which was the condition you observed during our site meeting.

As per our discussions on-site, the degree and extent of apparent contamination is unknown and will likely require further assessment in order to evaluate options for properly addressing the situation. Such an assessment is usually best done in a planned manner, as opposed to a rush response, as would be the case here. Further, attempting to mitigate a condition with so many unknowns in close proximity to a flowing creek could arguably create a greater risk to the environment, not to mention site personnel, should the condition worsen as we dig further. Therefore, methods to stabilize the current condition were discussed.

Since the main concern was preventing potentially contaminated materials from entering the creek by way of erosion, ODOT proposed utilizing the existing project design for slope stabilization to secure the material in question. The existing design consists of filter blanket placed on the slope which is then covered with rip rap, a common method to prevent bank erosion. Although not originally intended for our purposes, it was agreed that it's intended purpose was in fact what we were after. In addition, it was discussed that clean material could be placed atop the material in question prior to stabilization, in order to further separate the material in question from potentially erosive conditions. Understanding these measures would not necessarily be a long-term fix, it was agreed they could be considered prudent and appropriate.

Based on yesterday's meeting, the contractor has been directed to continue work in the manner described above. As such, we respectfully request that you contact us immediately if any of the above is not in line with what you understood following yesterday's meeting. Thank you again for your assistance in this matter, and please do not hesitate to call if you have questions or concerns.

Sincerely,

Jeff
C (405) 249-2751

From: Jeff Pearl
Sent: Tuesday, October 06, 2015 4:14 PM
To: katrina higgins-coltrain; Brittain, Amy (Amy.Brittain@deq.ok.gov)
Cc: Dawn Sullivan; Shannon Sheffert; Mark Zishka; Mark Scott; James Pruett
Subject: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Katrina and Amy –

ODOT understands evidence of potential contamination was observed at the above Creek County bridge project, for which ODOT is providing administrative oversight and support due to the use of federal funds. Apparent oily material was reportedly observed during installation of the toe ditch for rip rap being placed on the east stream bank, just north of the bridge. Discussions with on-site workers indicate no such material has been observed elsewhere on the project, and that it appears

to be limited to the toe/bottom of the stream bank in that area.

As discussed yesterday, due to the short time frame remaining in the referenced project, we plan to move forward with the project, adjusting the work to avoid any further disturbance of the toe/bottom of the stream bank. The construction folks have indicated the two remaining activities of potential concern are the removal of the work road and the subsequent placement of rip rap in that area. Regarding the work road, the contractor is already required to only remove material placed for the temporary work road. The importance of doing so will be emphasized and closely monitored in the field. Regarding the toe ditch, the design/construction engineers were consulted and have indicated the slope in that area is adequate to place the rip rap without the toe ditch. Therefore, the potential for additional disturbance of the material in question will be minimized.

As an additional precautionary measure, a qualified spill response contractor will be on-site during the above activities, and will deploy a downstream boom as a precaution. The work area and the stream will be monitored for evidence of contamination. If detected, construction activities will be suspended and the changed condition assessed using appropriate field screening methods. Additional sorbent pads, booms, etc. will be deployed as needed to prevent downstream migration. No construction activities will continue in the area of potentially impacted material until an appropriate course of action to address the condition can be developed and discussed with all concerned parties, including EPA and DEQ.

Also as discussed, I understand the right of way in this area is owned by Creek County. Therefore, we have consulted with the County and advised them of the above approach. We have also discussed their potential responsibility moving forward, such as cooperating with EPA and DEQ to the extent that notice may need to be placed in the County file advising of the potential effect on future work in this area. Also, an access agreement will likely be needed to allow EPA and DEQ to collect and analyze samples from the County's right of way.

My understanding is the work road is scheduled to be removed next week. I will follow up with on-site personnel and will provide a firm start date once established.

As always, please feel free to call if you have any questions, comments, concerns, etc. We truly appreciate your cooperation in this matter.

Sincerely,

Jeffrey D. Pearl, P.G.
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